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DEC 18 2008

December 17, 2008

By Hand and U.S. Mail

United States District Court Southern District of New York 500 Pearl Street, Room 650 New York, New York 10007-1312

Attn: Honorable Richard M. Berman

Re: <u>Tramp Maritime Enterprises Ltd. v. NT Shipping Marshall Islands</u>

08 CV 9926 (RMB)

Request for Sixty (60) Day Adjournment of Initial Pre-Trial Conference

Dear Judge Berman:

We are attorneys for the Plaintiff, Tramp Maritime Enterprises Ltd., in the above-captioned matter and write to respectfully request a sixty-day (60) adjournment of the upcoming Initial Pre-Trial Conference. The Conference is presently scheduled to proceed on Monday, December 22, 2008 at 10:30 a.m. This is a maritime Rule B attachment matter. As of the time of this writing, Defendants have not appeared in the instant litigation. Up until just a few moments ago, Plaintiff had not yet restrained any funds and Defendant had not answered, moved or otherwise appeared in these proceedings. However, we have just received notice that a wire transfer in the amount of USD \$5,889.41 has just been restrained at garnishee, JP Morgan Chase Bank. We shall be providing the Defendant with prompt notice of this attachment.

Accordingly, under the circumstances, Plaintiff respectfully requests a sixty (60) day adjournment of the initial Pre-Trial conference. This is the first request for an adjournment made by the Plaintiff.

In advance, thanking the Court for its time and consideration, we remain,

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SO ORDERED! Date: 12 19 08

Richard M. Berman, U.S.D.J.

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